



**Tannenbaum Helpert**  
**Syracuse & Hirschtritt** LLP

900 Third Avenue New York, NY 10022-4775  
Tel: (212) 508-6700 | Fax: (212) 371-1084  
www.thsh.com | @THSHLAW

Andrew P. Yacyshyn  
Direct Dial: (212) 508-6792  
yacyshyn@thsh.com

July 31, 2019

**BY ECF**

The Honorable Lois Bloom, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201  
Tel: 718-613-2170

Re: Request for an Extension of Time to Respond to Complaint  
*Francisco Almonte Gomez v. K. Dew Realty Corp.*  
Case No.: 19-cv-3143-WFK-LB

Dear Judge Bloom:

We are the attorneys for the Defendant in connection with the above-referenced wage and hour action.

We write to respectfully request a 30-day extension of time for Defendant to respond to the Complaint. Defendant's deadline to respond to the Complaint is currently August 5, 2019. Accordingly, the parties request that Defendant's deadline to respond to the Complaint be extended to September 4, 2019. This is the second request for an extension of time to respond to the Complaint and is being made in light of the parties' ongoing settlement discussions, which, to date, have included exchanges of certain settlement proposals.

Plaintiff's counsel has consented to the extension of time requested herein.

Thank you, Your Honor, for your consideration in this matter.

Respectfully submitted,

Andrew P. Yacyshyn



Honorable Lois Bloom

July 31, 2019

Page 2 of 2

cc: Ismail Sinan Sekendiz  
Sekendiz Law Firm P.C.  
45 Broadway, Ste. 1420  
New York, NY 10006  
212-380-8087  
Email: isinan@hotmail.com  
*Attorney for Plaintiff*  
[BY ECF & EMAIL]